

Exhibit A

*March 24 Email from Mr. Lorenc to Mr.
Szkarlat*

Mevorach, Kai D.

From: robert.lorenclaw.com <robert@lorenclaw.com>
Sent: Monday, March 24, 2025 3:19 PM
To: Eric Szkarlat; admin@spi-pc.com; tlf@msf-law.com; kaf@msf-law.com; jmiller@westermanllp.com; charles; sbm@msf-law.com; allen@allenschwartzlaw.com; Koevary, Jonathan T.; jhy@msf-law.com; ndenning@wiggin.com; leslie.thorne@haynesboone.com; Mateo, Katherine E.; aishlinn.bottini@haynesboone.com; sgriffin@grifflegal.com; gkeller@steptoe.com; ssouthard@klestadt.com
Cc: Bunin, Martin; Tiffany J. Klinger; Brittany Zak
Subject: Re: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al

Good afternoon Mr. Szkarlat,

Based on the Court's prior order concerning Mot. Seq. 13, Plaintiff was permitted to file a memorandum of law on or before March 26th with oral argument scheduled on March 27th. (see Doc. Nos. 1363 and March 18th email scheduling oral argument.). However, in light of Mr. Simpson's recent *pro se* filings to remove the cases before this Court to the SDNY I am seeking guidance and/or clarity from the Court concerning the dates moving forward.

My understanding of 28 U.S.C. § 1446(d) is that upon the removal becomes effective as of the filing of the notice of removal with the clerk and that the State court shall proceed no further unless and until the case is remanded. As such, under the circumstances as of today, are oral arguments and the submissions dates suspended and/or stayed at this time?

Please note that I understand Mr. Simpson's position to be that the actions before the Court are effectively stayed at this time and, based on the statutory authority, it would appear that to be the case. However, as of date my office still represents Mr. Simpson and JJ Arch in the action before this Court. To that end, to both ensure compliance with this Court's orders as well as for scheduling matters, are the dates with respect to the submission of Plaintiffs' MOL in opposition to Mot. 13, the oral argument pertaining thereto, as well as Defendant Oak's recently filed motion to strike JJ Arch's counterclaims (Doc. 1395) effectively adjourned for the foreseeable future?

Thank you,

Rob Lorenc

From: Eric Szkarlat <eszkarlat@nycourts.gov>
Date: Monday, March 17, 2025 at 12:38 PM
To: admin@spi-pc.com <admin@spi-pc.com>, tlf@msf-law.com <tlf@msf-law.com>, kaf@msf-law.com <kaf@msf-law.com>, jmiller@westermanllp.com <jmiller@westermanllp.com>, robert.lorenclaw.com <robert@lorenclaw.com>, charles <charles@cwertmanlaw.com>, sbm@msf-law.com <sbm@msf-law.com>, allen@allenschwartzlaw.com <allen@allenschwartzlaw.com>, jkoevary@olshanlaw.com <jkoevary@olshanlaw.com>, jhy@msf-law.com <jhy@msf-law.com>, ndenning@wiggin.com <ndenning@wiggin.com>, leslie.thorne@haynesboone.com <leslie.thorne@haynesboone.com>, kmateo@olshanlaw.com <kmateo@olshanlaw.com>,

aishlinn.bottini@haynesboone.com <aishlinn.bottini@haynesboone.com>, sgriffin@grifflegal.com <sgriffin@grifflegal.com>, gkeller@steptoe.com <gkeller@steptoe.com>, ssouthard@klestadt.com <ssouthard@klestadt.com>
Cc: Bunin, Martin <MBunin@FarrellFritz.com>, Tiffany J. Klinger <TJKLINGE@nycourts.gov>, Brittany Zak <Bzak@nycourts.gov>
Subject: RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al

Counsel:

We received the above attachment and an email from Mr. Martin G. Bunin of Farrell Fritz, P.C., whom I was told via the below-copied email Mr. Huebscher seeks to retain in connection with the above-captioned action. However, this document has not been filed to NYSCEF with a request for Court approval. The Judge will not sign any document submitted over email. Furthermore, counsel to all parties must be copied on email correspondence with chambers.

Please file the attachment to NYSCEF. Furthermore, the Court will require an appropriate application filed to NYSCEF with respect to Mr. Huebscher's employment of Farrell Fritz, per the receiver order (NYSCEF 1360).

Best,

Eric Szkarlat
Commercial Division Law Clerk to Hon. Joel M. Cohen
60 Centre Street
New York, NY 10007

[Part 3 Practices and Procedures](#)

[Part 3 Sealing Practices](#)

Please note my clerkship term will conclude on March 26, 2025, after which time this inbox will no longer be monitored. After March 26, 2025, please direct all inquiries to SFC-Part3@nycourts.gov.

--

Mr. Szkarlat,

Eric Huebscher has asked my law firm, Farrell Fritz, P.C. , to represent him as receiver (the "Receiver") in the above action. We intend to apply to the Court for approval as counsel to the Receiver shortly. I am eligible for appointment as counsel to a receiver under Part 36 of the Rules of the Chief Judge (Martin Gerald Bunin, Fiduciary ID no. 107467, Attorney registration number 1088848).

Attached is the Receiver's bond. Please ask Justice Cohen to review and consider it, and sign it if it meets with his approval.

If Justice Cohen signs it, please e-mail the bond back to me for filing.

Thank you.

Martin G. Bunin

Martin G. Bunin, Counsel



622 3rd Ave, New York, NY 10017

Direct: (646) 329-1982

Cell: (917) 887-0056

mbunin@farrellfritz.com | www.farrellfritz.com

Albany | Hauppauge | New York City | Uniondale | Water Mill